

ORIGINAL

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BARBARA A. WILHELM,
Plaintiff

v.

COMMONWEALTH OF PA.;
PENNSYLVANIA STATE POLICE;
COLONEL PAUL J. EVANKO,
COMMISSIONER; LIEUTENANT
COLONEL THOMAS K. COURY; and
CAPTAIN MICHAEL. D. SIMMERS,
Defendants

NO. 1:CV-01-1057

(JUDGE RAMBO)

FILED
HARRISBURG, PA.
MAY 08 2002

MARY E. HANCOCK, CLERK
Per
Deputy Clerk

UNSWORN DECLARATION OF BARBARA A. WILHELM

I, **BARBARA A. WILHELM**, hereby state based on my personal knowledge and under penalty of perjury that the following is true and correct:

1. I am the plaintiff in the above-captioned matter.
2. My employment with the Pennsylvania State Police was terminated on May 1, 2000.
3. On or about June 13, 2000, at 2:00 p.m., I met with a representative of the Pennsylvania Human Relations Commission.
4. The representative asked me to complete several questionnaires.
5. I used the questionnaires to articulate all of my claims related to my former employment.

6. The representative used the questionnaires to draft my complaint.
7. On December 6, 2000, I received documents disclosing that the Pennsylvania State Police used the code "02200" to describe my termination.
8. On March 5, 2001, at approximately, 3:00 p.m., I spoke with Richard Clites, Chief Personnel Systems Division, Bureau of Personnel, Office of Administration, Governor's Office, who informed me that code "02200" was derogatory, and would be regarded negatively by Commonwealth of Pennsylvania managers considering hiring me.
9. Mr. Clites also explained that there were other codes that were not derogatory and that accurately described a termination resulting from reorganization.
10. This was the earliest date I was able to ascertain this information.
11. That was the first time I learned of the harm to my opportunities for future employment with the Commonwealth of Pennsylvania caused by the Pennsylvania State Police entering code 02200.


BARBARA A. WILHELM

DATED: May 8, 2002